REMARKS

The Application has been carefully reviewed in light of the Office Action mailed December 18, 2006. At the time of the Office Action, Claims 1-25 are pending in this patent application. Claims 1-25 are rejected. Reconsideration and allowance of all pending claims is respectfully requested in view of the following remarks.

Rejection under 35 U.S.C. 102

Claims 1-4, 8-10, 14-16 and 20-25 are rejected under 35 U.S.C. 102(b) as being anticipated by *Gaddess* et al. (U.S. Patent No. 6,385,668 hereinafter "Gaddess"). The system and method of Gaddess is directed toward hardware maintenance and reconfiguration. *Gaddess* does not teach a system and method for updating the layout of a telecommunications network.

Particularly, in claim 1 Applicants claim a maintenance entry component for receiving maintenance information that equipment has been added or removed from a physical layout of a telecommunications network. *Gaddess* discloses a maintenance request, however, that maintenance request is not maintenance <u>information</u> that specifies equipment that has been <u>added or removed</u> from the physical layout of the telecommunication network as in Claim 1. *Gaddess* specifies that the request is for hardware maintenance (Gaddess, col. 7, line 62-63).

Gaddess also does not teach a structural database component that updates the physical layout database of the network to reflect equipment has been added or removed from the physical layout of the telecommunications network as claimed by Applicants. *Gaddess* mentions a <u>single</u> switch module data base or database used to "acquire stored information relating to the hardware elements to be reconfigured, and determine fly relationships among the hardware elements to be reconfigured and other hardware elements to which the hardware elements to be reconfigured are connected" (*Gaddess*, col. 2, lines 55-61). There is no mention of updating a physical layout database of the network. As before, there is a difference between <u>reconfiguration</u> as taught by *Gaddess* and <u>updating</u> the physical layout database based on the addition or removal of equipment as claimed by Applicants.

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With regard to claims 2-3, the portions of *Gaddess* cited do not mention the maintenance information, or maintenance request referenced in *Gaddess*, including lines that have been added or removed from a particular line unit. The description of lines and line units within *Gaddess* specifies "Line units to 110 provide interface to customer lines that connect to customer premise equipment, and trunk units 112 provide interface to the trunks that connect the other elements of the network, such as switches." (*Gaddess*, col. 5, lines 34-41)

With regard to claim 4, Applicants claim that the information in the physical layout database may be utilized to generate line usage reports. The portion of *Gaddess* cited by the Examiner states that "software processes use data base records to keep track of the state of the subordinate hardware elements." (*Gaddess*, col. 6, lines 17-19). Keeping track of the state of hardware elements does not indicate that line usage reports are being generated using the information from the physical layout database. State of a hardware element does not teach, suggest, or disclose a line usage report.

With regard to claim 8, the cited text from *Gaddess*, col. 8, lines 57 - col. 9, line 24 does not specify receiving maintenance information that equipment has been added or removed from a physical layout of a telecommunications network. The cited portion of *Gaddess* does specify various hardware relationship sets. These hardware relationship sets defined by *Gaddess* and a list of such relationships including DEDICATED, DELEGATED, AND ACQUIRED do not disclose, teach or suggest maintenance information that equipment has been added or removed from a physical layout of a telecommunications network. (*Gaddess*, col. 7, lines 21-39).

Additionally, *Gaddess* does not teach automatically updating a physical layout database of the network to reflect that equipment has been added or removed from the physical layout of the telecommunications network, such that information in the physical layout database may be utilized to generate line usage reports. As previously described with regard to claim 1, state of the hardware elements is not defined by *Gaddess* to indicate a physical layout of the telecommunications network. Layout and state have different definitions and connotations. Additionally, keeping track of the state of hardware elements does not teach, suggest or disclose that information in the database may be utilized to generate line usage reports.

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Turning now to claim 9, although *Gaddess* may teach administrative and control functions there is nothing to suggest, teach, or disclose that *Gaddess* may be used to store maintenance information and display the maintenance information for display with line usage information. Line usage information is specific term of art not disclosed, taught, or suggested by *Gaddess*.

Similar arguments as specified above are also asserted for claims 10, 14-16, and 20-25.

Rejection under 35 U.S.C. 103

Claims 5-7, 11-13, and 17-19 are rejected under 35 U.S.C. 103(a) as being unpatentable over *Gaddesss*, et al. (U.S. Patent No. 6,385,668) in view of Mehra, et al. (U.S. Patent No. 7,089,583). Mehra specifies that "BDK provides the ability to track the history of all changes to an object, including the date of a change, the identity of the user making the change, and a justification for the change." (Mehra, col. 21, lines 52-55) Mehra does specify that the changes are maintenance information as claimed by Applicants in claims 5-7 and 11-13.

Further, neither Mehra nor *Gaddess* discloses displaying line usage information or a line usage report as claimed in claims 18 and 19.

CONCLUSION

In view of the above amendment, Applicants believe the pending application is in condition for allowance.

Applicants believe no fee is due with this response. However, if a fee is due, please charge our Deposit Account No. 50-2816, under Order No. 024777.0136PTUS from which the undersigned is authorized to draw.

Dated: March 19, 2007   Respectfully submitted,

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